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November 15, 2021

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Application of Duke Energy Progress, LLC for Approval of Prepaid Advantage Program
Docket No. 2021-347-E

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff ("ORS") hereby notifies the Public Service Commission of South Carolina ("Commission") that ORS has reviewed the application submitted by Duke Energy Progress, LLC ("DEP" or the "Company") requesting the Commission approve its Prepaid Advantage Program (the "Program") and grant a partial waiver of S.C. Code Ann. Regs. 103-352, which would allow Program customers to avoid paying a deposit, catch up on any arrearage they may have, and have flexibility in future payments. The Company asserts neither notice to the public at-large, nor a hearing is required regarding these requests.

On May 12, 2015, in Docket No. 2015-136-E, the Commission approved Duke Energy Carolinas, LLC ("DEC") pilot program for a prepaid product. The Commission approved DEC's request to move the Program from pilot status to a fully commercialized program in Order No. 2019-323. ORS actively monitors DEC's progress with that program and provides feedback as appropriate.

On April 10, 2019, ORS and the Company filed a stipulation in Docket No. 2018-318-E, Application for Adjustments in Electric Rate Schedules and Tariffs and Request for Accounting Order, in which the Company agreed to withdraw its request for approval of the Prepaid Advantage Program from its general rate case and file the request in a separate Docket. The application in this Docket fulfills certain requirements of the stipulation.

ORS reviewed the Program's compliance with S.C. Code Ann. § 58-27-250, and applicable Commission Regulations pertaining to reading of meters and billing of usage, providing rate schedule information to consumers, accepting applications for service, deposit requirements, billing and billing adjustments, payments, disconnection and reconnection of service, and complaint handling. The regulations specifically reviewed include S.C. Code Ann. Regs. §§ 103-321, 103-330, 103-331, 103-339, 103-340, 103-341, 103-342, 103-345, and 103-352.

ORS also compared the Program as proposed to DEC's Prepaid Advantage Program and finds the two are materially similar.

Based on its review, ORS does not object to Commission approval of the Program or the partial waiver of S.C. Code Ann. Regs. § 103-352 in order to implement the Program as proposed. That notwithstanding, ORS does not waive, and specifically reserves, its rights to respond to and review any subsequent Company requests regarding this Program, including the right to review Program costs and any cost recovery related to the Program in any future filings.

Sincerely,



Andrew M. Bateman

cc: All Parties of Record (via e-mail)
C. Jo Anne Wessinger Hill, Esquire (via e-mail)
David Butler, Esquire (via e-mail)